

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MARYLAND**

Civil Division

Paradise Point, LLC
P.O. Box 30224
Bethesda, MD 20824

Civil No. _____

Plaintiff,

v.

Stephen J. McGibbon, *et al.*,

Defendants.

MOTION FOR PRELIMINARY INJUNCTION

NOW COMES the Plaintiff who, for their motion for a preliminary injunction, through their undersigned counsel and pursuant to Fed . R. Civ. P. 56, state:

1. Plaintiffs seek to enjoin the enforcement by the Tax Department of Prince George's County, Maryland, of a statute that discriminates against residents of Maryland who live outside of Prince George's County. (Please *see* Complaint for a fuller statement of claim.)
2. There is no adequate remedy at law.
3. The Complaint concerns a statute establishing a "limited auction" of tax liens.
4. Such a "limited auction" for the year 2019 is scheduled to commence in Prince George's County, Maryland, on May 13, 2019.
5. In order to obtain review of the statute, it is necessary to seek relief prior to the date of the scheduled auction to allow time for full briefing of the constitutional issues asserted in the Complaint.

WHEREFORE, for the above good and valid reasons, Plaintiff seeks a preliminary injunction pending final resolution of the within Complaint.

Respectfully submitted,

/s/ Lucas I. Dansie
Lucas I. Dansie, Esq. #00543
406 Fifth Street, NW
Washington, DC 20001
(202) 783-1597
Facsimile (202) 315-2513
lucas@dansielaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Motion for Preliminary Injunction was served on the 5th day of April, 2019 to

M. Andree Green, County Attorney
Prince George's County, Maryland
14741 Governor Oden Bowie Drive
Upper Marlboro, MD 20772

Stephen J. McGibbon, Tax Collector
Prince George's County, Maryland
14741 Governor Oden Bowie Drive
Upper Marlboro, MD 20772

/s/ Lucas I. Dansie
Lucas I. Dansie, Esq. #00543